

From: Todd Myers <tmyers@washingtonpolicy.org>
Sent: Friday, October 14, 2022 1:11 PM
To: DES SBCC
Subject: Residential Energy Code Modifications

External Email

Please accept these comments about the proposed Residential Energy Code changes.

Members of the board,

After working for more than two decades in environmental policy at state agencies and on state boards, I recognize a few consistent errors in proposals like the one being considered, including relying on out dated and incomplete information, and failing to assess the impact of the regulations in context of other existing laws. This proposal will not achieve the goals it purports to achieve, but will waste resources that could go to effective conservation and CO2-reduction policies.

1) This policy will not reduce CO2 emissions. Next year, Washington state will implement a strict cap on CO2 emissions. The purpose of that system was not only to set a goal but allow people to find the best way to meet that goal in a cost effective manner. The carbon cap eliminated the need for ad hoc and sector-specific regulations like the one being considered. This regulation would add nothing to the existing CO2 goal. No additional CO2 emissions will be avoided by the adoption of these code changes above existing policy. It will only mandate HOW our CO2 goals are met for a particular sub-sector of the economy. Claims that this reduces CO2 emissions ignores the existing policies and simply increases costs for no environmental benefits.

This alone eliminates the justification for these rules.

2) Many environmental activists and others acknowledge the truth of the first point, but argue that these regulations must be put in place because it is the ONLY way to meet the cap or that the regulations would cheaper than alternatives. This is not accurate on either count.

As for the cost, the modeling does not show the regulations are less expensive. The life-cycle analysis provided by RMI is out of date and is similar to the one they provided for the commercial building regulations. RMI revised their initial life-cycle analysis for commercial buildings at the last minute, and admitted the costs would increase under the new code. This is likely to be the same.

Additionally, some of the conclusions are based on assumptions without data. For example, there is no modeling of what adding heat pumps to houses that would not otherwise have air conditioners will do to electricity demand. It is likely that energy use in the summer would increase since most Washington houses don't currently have air conditioning. That calculus is not included - either in increased energy costs for consumers or for the impact it will have on Washington state's electrical grid.

Lastly, far from being the only way to meet our CO2 goals, these regulations have a high cost to reduce each metric ton of CO2 under the state law. Mandating this approach is simply unwise when there are

many other approaches that can reduce emissions in both in the near and long term that are less expensive.

The more important the committee members believe climate change is, the more they should demand that regulations, subsidies, and other expenditures are effective - reducing the maximum amount of CO2 for every dollar spent. The current rule does not do that, nor does it even attempt to demonstrate it meets that important metric.

Instead, the proposed regulation is based on information that is out of date, incomplete, and does not take into account the current legal environment by adding duplicative and needless regulations.

Todd Myers

Environmental Director | Washington Policy Center

(206) 963-3409

tmyers@washingtonpolicy.org

www.washingtonpolicy.org

“You never change things by fighting the existing reality. To change something, build a new model that makes the existing model obsolete.” - *Buckminster Fuller*